

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

JAMES B. GOODMAN,

Plaintiff,

v.

CORSAIR COMPONENTS, INC.,

Defendant.

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Civil Action No. 4:14-CV-01381 LNH

**DEFENDANT CORSAIR COMPONENTS, INC.’S DISCLOSURE REGARDING
NONINFRINGEMENT**

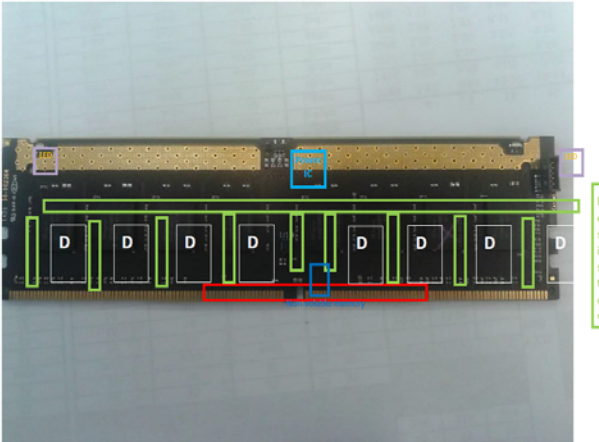
Pursuant to the Court’s ruling at the Case Management Conference held on September 8, 2014 and Management Order dated September 9, 2014 (ECF No. 25), Defendant Corsair Components, Inc. (“Corsair”) hereby through its counsel, submits a narrative of how its technology is different from Goodman’s patent.

Claim 1 of the U.S. Patent No. 6,243,315 requires the following two claim limitations:

- “a control device for selectively electrically isolating said memory devices from respective address lines and respective control lines so that when said memory devices are electrically isolated, any signals received on said respective address lines and respective control lines do not reach said memory devices” (this claim limitation in short form is written as “**control-device-with-selective-electrical-isolation**”) **“and”**
- “a memory access enable control device coupled to said control device and to said control lines for determining when said memory system is not being accessed and for initiating a low power mode for said memory system wherein said control device electrically isolates said memory devices and places said memory devices in said self refresh mode, thereby reducing the amount of electrical energy being drawn from an electrical power supply for said computer system.” (this claim limitation in short form is written as “**memory-access-enable-control-device**”)

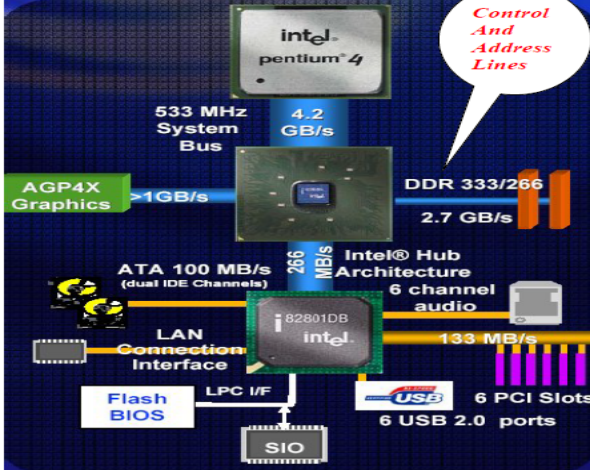
No control-device-with-selective-electrical-isolation
No memory-access-enable-control-device.

FIG. 1 - DIMM Module



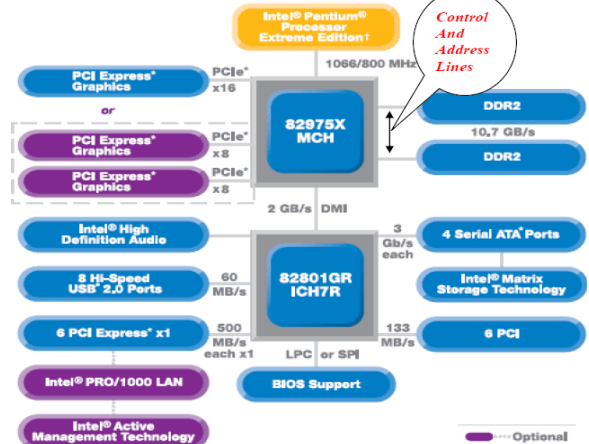
No control-device-with-selective-electrical-isolation
No memory-access-enable-control-device.

FIG. 2 - DDR PC Platform architecture



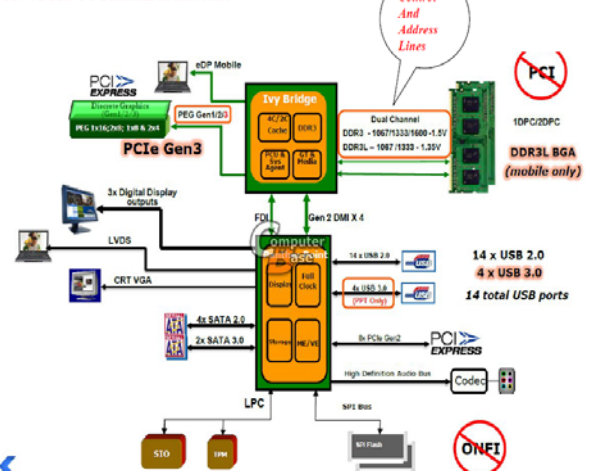
No control-device-with-selective-electrical-isolation
No memory-access-enable-control-device.

FIG. 3 - DDR2 PC Platform architecture



No control-device-with-selective-electrical-isolation
No memory-access-enable-control-device.

FIG. 4 DDR3 PC Platform architecture



Conclusion: The four schematics of different Corsair accused products show that a control-device-with-selective-electrical-isolation and a separate memory-access-enable-control-device do not exist on the Corsair accused products and thus Corsair accused products do not infringe.

Dated: September 25, 2014

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been forwarded to all counsel of record herein by way of:

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